

Message

**From:** Abramovitz, Aryel [abramovitz.aryel@epa.gov]  
**Sent:** 12/13/2019 2:19:42 PM  
**To:** Pruzinsky, Amanda [Pruzinsky.Amanda@epa.gov]  
**Subject:** Language used to send PA the SNC list  
**Attachments:** PADEP Q3 2019 SNC List.xlsx

Amanda, below is the email where I attached the SNC list (I also attached it here so you know how I formatted it). You can use something similar or totally do your own thing. I

Ex. 5 Deliberative Process (DP)

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discussed on December 4<sup>th</sup>.

Doug, Anita, Bob, and Krystal,

The FY19 Q3 (April 1-June 31) QNRC list is final so I wanted to schedule the next Quarterly Enforcement Management (QEM) call with you and your team to go over the current SNC list.

In the attached excel sheet, the first tab is the entire SNC list, and I am requesting that we discuss the **bolded** sites. The **blue** highlighted sites are sites are still on the SNC list but were given a “resolve pending” designation in previous QEM calls. I just wanted to confirm that these facilities are still in resolve pending status, so we can eliminate need to discuss them. The second tab is a short list of the bolded sites and blue highlighted sites, and I added which PADEP region each facility is in. The third tab is an automatically-generated key/dictionary to the column headings. Please note that I kept facilities for which EPA has taken the lead off the list.

During the EPA/States meeting, Krystal brought up the point that the states would like to know exactly how we pull this list so anyone can replicate it. In the past, we have pulled it from different sources (i.e. ICIS vs. ECHO) so internally we have decided to all use the same process and to all use ECHO’s Violation Tracker (under ‘Search Options’ and choosing ‘CWA-NPDES SNC’ for PA) to create the list ourselves. An ECHO gov login is required, but anyone can request access if needed.

Similar to previous QEMs, in advance can you please have regional representatives provide in writing a summary of compliance status and enforcement activities for each **bold** facility? We’d particularly like to know the following for each facility:

1. Is there an existing enforcement addressing action to return the facility to compliance? When is the projected date to return to compliance? This information will help us to prioritize facilities to discuss with you in future QEMs.
2. Will PADEP initiate an enforcement addressing action for the facility to return to compliance?
3. Does PADEP believe this facility may not return to compliance in 60 days?
4. Would any facility be a candidate to refer to EPA for follow up?

Additionally, we would like one sentence relating to each **blue** facility that confirms its resolve pending status.

I am looking to hold the call in mid to late November to provide enough time to obtain the written updates. Would you please send your team’s availability for the following dates: November 15, 25, 26, 27? If none of these work, we can push it until early December. It would be great if I can obtain the narratives a week in advance of our call, if possible. I will also send out an agenda closer to the call.

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